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SECURITIES AND EXCHANGE COMMISSION
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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

MATTHEW WADE BEASLEY; BEASLEY
LAW GROUP PC; JEFFREY J. JUDD;
CHRISTOPHER R. HUMPHRIES; J&J
CONSULTING SERVICES, INC., an Alaska
Corporation; J&J CONSULTING SERVICE,
INC., a Nevada Corporation; J AND J
PURCHASING LLC; SHANE M. JAGER;
JASON M. JONGEWARD; DENNY JAGER;
and ROLAND TANNER;

Defendants;

THE JUDD IRREVOCABLE TRUST; PAJ
CONSULTING INC; BJ HOLDINGS LLC;
STIRLING CONSULTING, L.L.C.; CJ
INVESTMENTS, LLC; JL2
INVESTMENTS, LLC; ROCKING HORSE
PROPERTIES, LLC; TRIPLE THREAT
BASKETBALL, LLC; ACAC LLC;
ANTHONY MICHAEL ALBERTO, JR.; and
MONTY CREW LLC;

Relief Defendants.

Case No.: 2:22-cv-00612

Judge: James C. Mahan
Magistrate Judge: Elayna J. Youchah

**PLAINTIFF SECURITIES AND
EXCHANGE COMMISSION'S AND
DEFENDANT ROLAND TANNER'S
STIPULATION CONCERNING
LIVING EXPENSES TO AND
INCLUDING SEPTEMBER 30, 2022**

1 **WHEREAS**, on April 12, 2022, Plaintiff United States Securities and Exchange
 2 Commission (“SEC”, “Commission”, or “Plaintiff”) filed its Complaint in this matter, alleging
 3 violations of the registration and/or antifraud provisions of the federal securities laws by
 4 Defendants, and the receipt of ill-gotten proceeds of such violations by Relief Defendants. (Dkt.
 5 No. 1.)

6 **WHEREAS**, on April 13, 2022, the Commission filed an Ex Parte Application for Entry
 7 of a Temporary Restraining Order and other equitable relief as to Defendants and an asset freeze
 8 as to Defendants and Relief Defendants (Dkt. No. 2), which was granted by the Court on April
 9 13, 2022. (Dkt. No. 3.)

10 **WHEREAS**, on April 21, 2022, the Court issued its Order Entering Preliminary
 11 Injunction, Asset Freeze, and other Equitable Relief as to Defendants and Relief Defendants,
 12 which, *inter alia*, continued the asset freeze imposed by the Court on April 13, 2022. (Dkt. No.
 13 56.) The Court’s Order provided that “any allowance for necessary and reasonable living
 14 expenses will be granted only upon good cause shown by application to the Court with notice
 15 and an opportunity for the Commission to be heard.”

16 **WHEREAS**, at the show cause hearing before the Court on April 21, 2022, the Court
 17 directed the parties to discuss any exceptions to the asset freeze for such necessary and
 18 reasonable living expenses before making such an application to the Court.

19 **WHEREAS**, counsel to the Commission and Defendant Roland Tanner have reached the
 20 following agreement as to an allowance for living expenses up to and including September 30,
 21 2022, and jointly provide this proposed agreement for approval by the Court:

- 22 1. Charles Schwab checking account no. XXXXXXXX5585 (the “Tanner Checking
 23 Account”) held in the name of the Tanner Family Trust shall be unfrozen to allow
 24 Defendant Tanner to pay living expenses and hold going-forward, earned income
 25 unconnected to the conduct alleged in the Complaint;
- 26 2. Defendant Tanner may withdraw up to \$2,854.00 per month—representing two
 27 times the IRS 2021 Allowable Living Expenses National Standards for a family of
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2—of previously-frozen funds from the Tanner Checking Account until September 30, 2022 for necessary and reasonable living expenses;

3. Defendant Tanner must provide to counsel to the Commission, without further request or subpoena, the monthly account statements of the Tanner Checking Account for review and inspection by no later than the 5th of each month this stipulation is in effect. The Tanner Checking Account statements shall be provided to counsel to the Commission by email to Casey R. Fronk (fronkc@sec.gov) and Tracy S. Combs (combst@sec.gov);
4. To the extent Defendant Tanner earns additional, going-forward income that he demonstrates, to the satisfaction of counsel for the Commission, is unconnected to the conduct alleged in the Complaint, such income may be used for the payment of necessary and reasonable living expenses and payment of attorney's fees and defense costs. As of the date of this stipulation, such income consists of the following:
 - a. those pension and retirement payments from Golden State Water Company (fka Southern California Water Company) and Southern California Edison Company, including the payment made by Golden State Water Company on April 29, 2022;
 - b. the continuing interest on the November 29, 2016 Promissory Note between Defendant Tanner and ECHO Payment Systems, Inc., including the interest payment made on April 12, 2022;
 - c. the continuing interest and investment income from Defendant Tanner's pre-2017 investments in the Mountain West Debt Fund, with such withdrawals not to exceed \$4,100.00 per month; and
 - d. the continuing interest payments on the pre-2017 lease tranches Defendant Tanner purchased from Community Finance LLC, with such withdrawals not to exceed \$2,416.00 per month.

WHEREAS, counsel to the Commission and Defendant Tanner have reached the following agreement as to a certain property sale pending at the time the asset freeze was entered by the Court on April 13, 2022:

1. The sale of 1168 Sparta Crest St., in Henderson, Nevada, may go forward, with all proceeds from the sale to be deposited in the attorney trust account (IOLTA) of Dyke Huish, where they shall not be transferred or dissipated.

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1 Dated: May 18, 2022

**U.S. SECURITIES AND EXCHANGE
COMMISSION**

2
3 /s/ Casey R. Fronk

TRACY S. COMBS

CASEY R. FRONK

4 *Attorneys for Petitioner U.S. Securities and*
5 *Exchange Commission*

6 Dated: May 18, 2022

Defendant

7 /s/ Roland Tanner

8 ROLAND TANNER

9 *Roland Tanner Pro Se*

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12 IT IS SO ORDERED:

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ELAYNA J. YOUCHAH
UNITED STATES MAGISTRATE JUDGE

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17 DATED: _____
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CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of May, 2022, I caused the **PLAINTIFF**
SECURITIES AND EXCHANGE COMMISSION'S AND DEFENDANT ROLAND
TANNER'S STIPULATION CONCERNING LIVING EXPENSES TO AND INCLUDING
SEPTEMBER 30, 2022 to be served to all parties entitled to service through the Court's ECF
system and to the following individuals by the means indicated below:

By U.S. Mail, first class, postage prepaid, to:

Matthew Wade Beasley
Nevada Southern Detention Center
2190 East Mesquite Avenue
Pahrump, NV 89060

BJ Holdings LLC
c/o Beasley Law Group PC, c/o Matthew Wade Beasley
Nevada Southern Detention Center
2190 East Mesquite Avenue
Pahrump, NV 89060

The Judd Irrevocable Trust
c/o Trustee Matthew Wade Beasley
Nevada Southern Detention Center
2190 East Mesquite Avenue
Pahrump, NV 89060

Jason M. Jongeward and JL2 Investments, LLC

Washington, UT

PAJ Consulting, Inc
21371 Estepa Cir.
Huntington Beach, CA 92648

Triple Threat Basketball, LLC
c/o Warren Rosegreen
Henderson, NV

By email to the following:

Dyke Huish

Huish Law Firm

huishlaw@mac.com

Counsel for Roland Tanner

Daniel Hill

Snow, Christensen & Martineau, P.C.

DDH@scmlaw.com

Counsel for ACAC LLC

Anthony Michael Alberto, Jr. and Monty Crew, LLC

@icloud.com

/s/ Tracy S. Combs

Tracy S. Combs